

STATE OF TENNESSEE

Office of the Attorney General



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Reply to:
Consumer Advocate and Protection Division
Attorney General's Office
P.O. Box 20207
Nashville, TN 37202

February 11, 2003

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Petition To Intervene, Docket No. 03-00117

Dear Chairman Kyle:

Enclosed is an original and fourteen copies of the Consumer Advocate and Protection Division's Petition to Intervene in the United Cities Gas Company's Request Changing the Definition of Interest Rate in Section 3.5. Copies furnished to counsel of record for interested parties.

Sincerely,

Vance Broemel
VANCE BROEMEL,
Assistant Attorney General

cc: Counsel of Record
52476

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**UNITED CITIES GAS COMPANY, A
DIVISION OF ATMOS ENERGY
CORPORATION, REQUEST
CHANGING THE DEFINITION OF
INTEREST RATE IN SECTION 3.5**

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DOCKET NO. 03-00117

PETITION TO INTERVENE

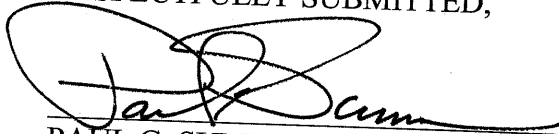
Comes Paul G. Summers, the Attorney General for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Attorney General"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), and petitions to intervene in this docket on behalf of the public interest because consumers may be adversely affected by United Cities Gas Company's Request Changing the Definition of Interest Rate in Section 3.5. For cause, the Petitioner would show as follows:

1. The Consumer Advocate Division of the Office of the Attorney General is authorized by Tenn. Code Ann. § 65-4-118 (c)(2)(A) to initiate a contested case, and participate or intervene in proceedings to represent the interests of Tennessee consumers in accordance with the Uniform Administrative Procedures Act ("UAPA").
2. United Cities Gas Company ("UCG") is a company regulated by the Tennessee Regulatory Authority ("TRA"). UCG sells natural gas to consumers in the State of Tennessee.

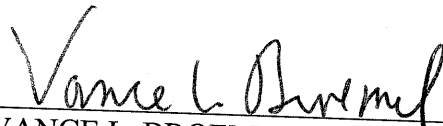
3. The present docket, Docket No.03-00117, involves a request by United Cities Gas Company to change the interest rate it pays on customers deposits from 6% to a rate based on U.S. Treasury rates, which are currently lower than 6%.
4. Unites Cities has not provided any justification for lowering the interest rates paid to consumers. In the absence of any justification, including supporting facts, the TRA should deny the request.
5. In addition, United Cities has not indicated whether it plans to lower prices to consumers to reflect the savings it anticipates from lower interest rates.
6. Only by intervening and participating in this proceeding can the CAPD work to protect the public interest.

Wherefore the Petitioner prays the Authority to grant its Petition to Intervene.

RESPECTFULLY SUBMITTED,



PAUL G. SUMMERS, B.P.R. #6285
Attorney General
State of Tennessee



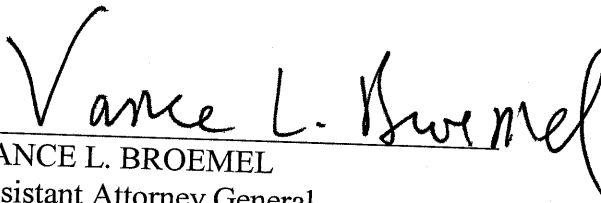
VANCE L. BROEMEL, B.P.R. #011421
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
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(615) 741-8733

Dated: February 11, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on February 11, 2003.

Patricia J. Childers
Manager - Regulatory Affairs
United Cities Gas Corporation
810 Crescent Centre Drive, Suite 600
Franklin, Tennessee 37064-5393


VANCE L. BROEMEL
Assistant Attorney General